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Baker

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

VIRAL DRM LLC,

Plaintiff,

v.

JOSHUA JOSEPH BAKER,

Defendant.

Case No.: 3:23-cv-06261-JSC

**JOINT REQUEST TO VACATE
INITIAL CASE MANAGEMENT
DEADLINES**

The Honorable Jacqueline Scott Corley

Plaintiff VIRAL DRM LLC (“Viral DRM”), and Defendant JOSHUA JOSEPH BAKER (“Baker”) (collectively the “Parties”), by and through their undersigned counsel, hereby jointly request and agree as follows:

WHEREAS, Viral DRM filed its Third Amended Complaint on October 9, 2024 (ECF 57);

WHEREAS, the Court noticed the Initial Case Management Conference for December 19, 2024, with the Joint Discovery Report deadline as December 12, 2024. (ECF 63)

1 WHEREAS, the Parties reached a settlement in principle on November 21,
 2 2024, and filed a Notice of Settlement, requesting until December 20, 2024 to finalize
 3 the settlement and file a dismissal.

4 WHEREAS, the Parties request that the Court vacate December 12, 2024, Joint
 5 Scheduling Report deadline and vacate the Initial Case Management Conference set
 6 for December 19, 2024, as the Parties finalize the settlement.

7 IT IS HEREBY REQUESTED that the Court vacate the December 12, 2024,
 8 deadline to file the Joint Discovery Report, and further vacate the December 19, 2024,
 9 Initial Case Management Conference. Lastly, the Parties reiterate their request in the
 10 Notice of Settlement to have up to and including December 20, 2024, to file a
 11 dismissal.

12
 13 DATED: December 12, 2024

Respectfully submitted,

14
 15 /s/Matthew L. Rollin

MATTHEW L. ROLLIN

16 **SRIPLAW, P.A.**

17 *Counsel for Plaintiff VIRAL DRM LLC*

/s/ Michael Friedland

MICHAEL FRIEDLAND

18 **FRIEDLAND CIANFRANI LLP**

*Counsel for Defendant Joshua Joseph
 Baker*

19
 20 **ATTESTATION**

21
 22 Pursuant to Local Rule 5.4.3.4(2)(i), all signatories listed, and on whose behalf
 23 this filing is submitted, concur in the filing's content and have authorized the filing.

24
 25 /s/ Matthew L. Rollin

26 MATTHEW L. ROLLIN